UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	
	§	
ADRIANA ALEJANDRA GALVAN-	§	
CONSTANTINI,	§	
LUIS MONTES-PATINO,	§	CRIMINAL NO. 5:17-CR-00560
CARLOS VELASQUEZ-FLORES,	§	
ADRIAN ARCINIEGA-HERNANDEZ,	§	
RAVINDER REDDY GUDIPATI,	§	
HARSH JAGGI, and	§	
NEERU JAGGI,	§	
	§	
Defendants.	§	

GOVERNMENT'S NOTICE OF INTENT TO OFFER EXPERT TESTIMONY

COMES NOW the United States of America and files this notice of its intention to offer

testimony under Rule 702.

Rule 702 of the Federal Rules of Evidence provides that "[i]f scientific, technical, or other

specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact

in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education,

may testify thereto in the form of an opinion or otherwise, if (1) the testimony is based upon

sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3)

the witness has applied the principles and methods reliably to the facts of the case."

As indicated on his resume (Attachment A)[1], Aaron Gogley has been a Special Agent

with the IRS-Criminal Investigation for 20 years, during which he has investigated money

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[1] In addition to his resume, the Government will make other evidence concerning SA Gogley
available for the Defendants' review.

laundering and other financial crimes. SA Gogley is a Certified Anti-Money Laundering

Specialist (CAMS) and has been qualified in United States district courts five times as a money

laundering and/or Bank Secrecy Act expert. The Government will offer SA Gogley as an expert

in money laundering generally, Trade-Based Money Laundering (TBML), and in Black Market

Peso Exchange (BMPE) money laundering schemes in particular. Specifically, SA Gogley will

testify to the following:

> (1) money laundering generally; (2) TBML and BMPE money laundering schemes;
> (3) common conduct and motivation for the conduct of participants in TBML and
> BMPE money laundering schemes; (4) analysis of financial and other business
> records, recorded conversations, and other evidence in this case documenting the
> co-conspirators' pattern of transferring money and goods; (5) the resemblance of
> that pattern to a typical BMPE money laundering scheme; (6) the differences
> between that pattern and the operation of legitimate businesses; (7) the effect of
> that pattern on concealing or disguising from law enforcement the nature, location,
> source, ownership or control of illegal proceeds, including those from drug
> trafficking; and (8) the Bank Secrecy Act cash reporting requirements (i.e., Form
> 8300, Currency Transaction Report, and Currency and Monetary Instrument
> Report) generally, and, in particular, their significance in BMPE money laundering
> schemes, common reasons for cash-reporting failures, and the effect of cash-
> reporting failures on concealing or disguising from law enforcement the nature,
> location, source, ownership or control of illegal proceeds, including those from
> drug trafficking.

Finally, the Government reserves the right to elicit additional expert testimony from SA

Gogley, or any other qualified witness, to rebut testimony, expert or otherwise, offered by any

defendant in this case.

Respectfully submitted,

RYAN K. PATRICK
UNITED STATES ATTORNEY

/s/ José Angel Moreno
José Angel Moreno
Assistant United States Attorney

Deborah Connor
Chief
Money Laundering and Asset Recovery Section
Criminal Division, U.S. Department of Justice

/s/ Keith Liddle_____
Keith Liddle
Trial Attorney
Money Laundering and Asset Recovery Section
Criminal Division, U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2018, a true and correct copy of the Government's

Notice of Intent to Offer Expert Testimony was electronically filed with the Clerk of the Court

using the CM/ECF System, which will transmit notification of such filing to all Counsel of Record.

/s/ Keith Liddle_____
Keith Liddle
Trial Attorney
Money Laundering and Asset Recovery Section
Criminal Division, U.S. Department of Justice